

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

SANDRA MORENO, CARLOS MORENO, §
ELISEO CASTANEDA, FEDERICO VELA, §
JOSE GARCIA, JOSE VEGA GONZALES, §
BRISelda RODRIGUEZ, MARTHA §
JARAMILLO, and ROGELIO MARTINEZ, §

Plaintiffs, §

v. §

THE CITY OF BOVINA, TEXAS, JANA §
PITCOCK, Individually and in Her Former §
Capacity as City Manager, DONNA §
MITCHELL, Individually and in Her Capacity §
as Municipal Judge, Gary Sinclair, §
Individually and in His Former Capacity as §
Chief of Police, JONATHAN JIMENEZ, §
Individually and in His Former Capacity as a §
Police Officer of Bovina, Texas, MANNY §
JIMENEZ, Individually and in His Former §
Capacity as a Police Officer of Bovina, §
Texas, and OWEN FOSTER, Individually §
and in His Former Capacity as a Police §
Officer of Bovina, Texas, §

Defendants. §

CASE NO. 2:12-cv-00264

DEFENDANTS JONATHAN JIMENEZ, MANNY JIMENEZ AND OWEN FOSTER'S
DESIGNATION OF EXPERTS

Defendants may call the following witnesses to present evidence under Rules 702, 703, or
705 of the Federal Rules of Evidence:

1. Albert Rodriguez
4501 McCormick Mtn Drive
Austin, Texas 78734
(512) 656-4354
*Expert on Law Enforcement issues/alleged Constitutional violations
brought by Plaintiffs against these Defendants*

2. Lee Ann Reno, Texas SBN 00791509
701 S. Taylor, Suite 500
Post Office Box 15008
Amarillo, Texas 79105-5008
(806) 468-3300
Reasonable and necessary attorney fees incurred in this civil action
3. Mark D. White, Texas SBN 21317900
701 S. Taylor, Suite 500
Post Office Box 15008
Amarillo, Texas 79105-5008
(806) 468-3300
Reasonable and necessary attorney fees incurred in this civil action
4. Any experts designated by Plaintiffs

Respectfully submitted,

SPROUSE SHRADER SMITH P.C.

/s/ Lee Ann Reno

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**ATTORNEYS FOR DEFENDANTS
JONATHAN JIMENEZ, MANNY JIMENEZ AND OWEN
FOSTER, IN THEIR INDIVIDUAL CAPACITIES**

CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2013, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system will send a “Notice of Electronic Filing” to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means:

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GARY SINCLAIR & DONNA MITCHELL
(IN THEIR INDIVIDUAL AND OFFICIAL CAPACITIES) AND FOR JONATHAN
JIMENEZ, MANNY JIMENEZ, & OWEN FOSTER (IN THEIR
OFFICIAL CAPACITIES):**

William J. Wade
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/s/ Lee Ann Reno

Lee Ann Reno